

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

*The County of Cuyahoga, et al. v. Purdue
Pharma L.P., et al.*
Case No. 17-op-45004

MDL No. 2804

Hon. Dan Aaron Polster

**DECLARATION OF ASHLEY W. HARDIN
IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE
TESTIMONY OF THOMAS McGUIRE CONCERNING DAMAGES**

I, Ashley W. Hardin, declare as follows:

1. I am an attorney at Williams & Connolly LLP, counsel for Defendant Cardinal Health, Inc. in the above-captioned case.
2. I submit this declaration in support of Defendants' Motion to Exclude Testimony of Thomas McGuire Concerning Damages.
3. Attached as Exhibit 1 is a true and correct copy of the March 25, 2019 Expert Report of Professor Thomas McGuire concerning Damages to Bellwethers.
4. Attached as Exhibit 2 is a true and correct copy of the transcript of the deposition of Thomas McGuire, conducted on April 23 and April 30, 2019, and the Errata Sheet submitted by Thomas McGuire.

5. Attached as Exhibit 3 is a true and correct copy of an excerpt from the transcript of the deposition of David Cutler, conducted on April 27, 2019.

6. Attached as Exhibit 4 is a true and correct copy of an excerpt from the May 10, 2019 Expert Report of Matthew G. Bialecki submitted on behalf of certain Defendants in this case.

7. Attached as Exhibit 5 is a true and correct copy of an excerpt from Plaintiffs the County of Cuyahoga, Ohio and the State of Ohio *ex rel.* Prosecuting Attorney of Cuyahoga County, Michael C. O'Malley's Responses and Objections to Distributor Defendants' Third Set of Interrogatories, dated July 25, 2018.

8. Attached as Exhibit 6 is a true and correct copy of an excerpt from Summit County and City of Akron, Ohio Plaintiff's Responses and Objections to Distributor Defendants' Third Set of Interrogatories, dated July 24, 2018.

9. Attached as Exhibit 7 is a true and correct copy of an excerpt from Plaintiffs the County of Cuyahoga, Ohio and the State of Ohio *ex rel.* Prosecuting Attorney of Cuyahoga County, Michael C. O'Malley's Second Supplemental Responses and Objections to Distributor Defendants' Interrogatory No. 18 Pursuant to the Court's November 21, 2018 Order, dated November 30, 2018.

10. Attached as Exhibit 8 is a true and correct copy of an excerpt from Summit County, Ohio Plaintiff's Second Supplemental Response and Objections to Distributor Defendants' Interrogatory No. 18 Pursuant to the Court's November 21, 2018 Order, dated November 30, 2018.

11. Attached as Exhibit 9 is a true and correct copy of a letter from Anthony J. Majestro to Special Master Cohen, dated December 19, 2018.

12. Attached as Exhibit 10 is a true and correct copy of an excerpt from the transcript of the deposition of Maggie Keenan, conducted on January 18, 2019.

13. Attached as Exhibit 11 is a true and correct copy of an excerpt from the March 25, 2019 Expert Report of Professor Meredith Rosenthal.

14. Attached as Exhibit 12 is a true and correct copy of an excerpt from the transcript of the deposition of Meredith Rosenthal, conducted on May 5, 2019.

15. Attached as Exhibit 13 is a true and correct copy of an excerpt from the transcript of the deposition of Greta Johnson, conducted on January 15, 2019.

16. Attached as Exhibit 14 is a true and correct copy of an excerpt from the transcript of the deposition of Brian Nelsen, conducted on January 24, 2019.

Dated: June 28, 2019

Respectfully submitted,

/s/ Ashley W. Hardin
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CERTIFICATE OF SERVICE

I, Ashley W. Hardin, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Ashley W. Hardin
Ashley W. Hardin